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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

Mayra Margarita Hernandez, } Case No. 1:20-cv-00897-NONE-  
Plaintiff, } BAM  
vs. } STIPULATION AND  
Kilolo Kijakazi, Acting } ORDER FOR EXTENSION OF  
Commissioner of Social Security, } TIME  
Defendant. }

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 45-day extension of time, from September 1, 2021 to October 15, 2021, for Plaintiff to serve on defendant with PLAINTIFF'S OPENING BRIEF . All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. Plaintiff respectfully states that the requested extension is necessary due several merit briefs being due on the same week. Plaintiff's Counsel has due on the same week three

1 letter brief, two Opening Brief, and one Motion for Summary Judgment and  
2 requires additional time to brief the issues thoroughly for the Court's  
3 consideration.

4 Additionally, Counsel has recently received a greater number of Answers  
5 and Certified Administrative Records from defendant in cases in this district, and  
6 the three other California Districts, each of which require settlement negotiations  
7 or merit briefing. Counsel is in the process of increasing support staff to  
8 accommodate the increase in the number of cases at the briefing stage.

9 Defendant does not oppose the requested extension. Counsel apologizes to  
10 the Defendant and Court for any inconvenience this may cause.

11  
12 Respectfully submitted,

13 Dated: September 1, 2021 PENA & BROMBERG, ATTORNEYS AT LAW  
14

15 By: /s/ Jonathan Omar Pena  
16 JONATHAN OMAR PENA  
17 Attorneys for Plaintiff

18  
19 Dated: September 1, 2021 PHILLIP A. TALBERT  
20 Acting United States Attorney  
21 DEBORAH LEE STACHEL  
22 Regional Chief Counsel, Region IX  
23 Social Security Administration

24 By: \*/s/ Daniel P. Talbert  
25 Daniel P. Talbert  
26 Special Assistant United States Attorney  
27 Attorneys for Defendant  
28 (\*As authorized by email on September 1, 2021)

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## ORDER

Pursuant to stipulation, and cause appearing, Plaintiff's request for a second extension of time to file her Opening Brief is GRANTED. Plaintiff's Opening Brief shall be filed on or before October 15, 2021. All other deadlines in the Court's Scheduling Order are modified accordingly. No further extensions of time will be granted absent a demonstrated showing of good cause.

IT IS SO ORDERED.

Dated: **September 2, 2021**

/s/ Barbara A. McAuliffe

UNITED STATES MAGISTRATE JUDGE